

Exhibit 6

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case no. 1:23CV00878-TDS-JEP

DEMOCRACY NORTH CAROLINA; NORTH)
CAROLINA BLACK ALLIANCE; LEAGUE)
OF WOMEN VOTERS OF NORTH)
CAROLINA,)

Plaintiffs,)

vs.)

ALAN HIRSCH, in his official)
capacity as CHAIR OF THE STATE)
BOARD OF ELECTIONS; JEFF CARMON)
III, in his official capacity)
as SECRETARY OF THE STATE BOARD)
OF ELECTIONS; STACY EGGERS IV,)
in his official capacity as)
MEMBER OF THE STATE BOARD OF)
ELECTIONS; KEVIN LEWIS, in his)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
SIOBHAN O'DUFFY MILLEN, in her)
official capacity as MEMBER OF)
THE STATE BOARD OF ELECTIONS;)
KAREN BRINSON BELL, in her)
official capacity as EXECUTIVE)
DIRECTOR OF THE STATE BOARD OF)
ELECTIONS; NORTH CAROLINA STATE)
BOARD OF ELECTIONS,)

Defendants.)

30(b)(6) DEPOSITION OF THE
STATE BOARD OF ELECTIONS by
PAUL COX

NELSON MULLINS RILEY & SCARBOROUGH
301 HILLSBOROUGH STREET
RALEIGH, NC 27603

10:03 A.M.
MONDAY, FEBRUARY 24, 2025

By: Denise Myers Byrd, CSR 8340, RPR

1 A. I would look at his emails with us because they
2 would show you exactly what he was requesting.

3 We did have a meeting with him and his
4 staff where we talked about the various
5 processes, same-day registration and everything
6 else they were asking for as well so that we
7 could get a better understanding of what they
8 were seeking, but the back and forth in the
9 emails should give you the picture of what they
10 were seeking and how we understood what they
11 were seeking and what we were explaining we
12 could provide.

13 Q. Did anyone ever ask you to examine the impact
14 of -- or the failure and success rates of mail
15 verification by age of the registrant?

16 A. If it's not in there, then no.

17 Q. Did the state board do any of that analysis
18 independently?

19 A. No, not that I'm aware of.

20 Q. Did the state board have a general understanding
21 of how same-day registration and mail
22 verification failure rates break down by age?

23 A. No.

24 Q. If I said younger voters tend to use same-day
25 registration more often than older voters, would

1 that surprise you?

2 A. That actually might surprise me because
3 recently, I did have -- asked our data staff to
4 look at the average and median ages of people
5 who register in a given year compared to the
6 average and median age of people who registered
7 in that same year using same-day registration,
8 and to my surprise, it was very similar, those
9 two different categories. And actually, the
10 same-day registrant population was very slightly
11 older, like a year older on average or at a
12 median designation, but that's the usage of the
13 same-day registration in general. We didn't
14 look to those who failed mail verification
15 specifically.

16 Q. Do you know if that same-day registration
17 analysis that you're describing, was that
18 limited to general elections? Was it limited to
19 presidential elections? Was it inclusive of all
20 elections?

21 A. It would have been inclusive of all elections in
22 that year. So I asked him -- it was in
23 preparation for this deposition because it was a
24 topic I think you had mentioned on the sheet,
25 and so I asked one of our data professionals to

COURT REPORTER'S CERTIFICATE

I, DENISE MYERS BYRD, Court Reporter, CSR 8340, the officer before whom the foregoing deposition of Paul Cox, 30(b)(6) for the NC State Board of Elections, was conducted, do hereby certify that the witness's testimony was taken down by me in stenotype to the best of my ability and thereafter transcribed under my supervision; and that the foregoing pages, inclusive, constitute a true and accurate transcription of the testimony of the witness.

Before completion of the deposition, review of the transcript [X] was [] was not requested. If requested, any changes made by the deponent (and provided to the reporter) during the period allowed are appended hereto.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to this action, and further, that I am not a relative or employee of any attorney or counsel employed by the parties thereof, nor financially or otherwise interested in the outcome of said action. Signed this 10th day of March 2025.

Denise Myers Byrd
CSR 8340, RPR